

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PATRICIA J. RITCHIE,

Plaintiff,

-against-

NORTHERN LEASING SYSTEMS, INC. et al.,

Defendants.
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No. 12-cv-4992-KBF

**NOTICE OF
MOTION**

PLEASE TAKE NOTICE, that upon the judgment in favor of Defendants entered March 29, 2016 [ECF No. 266], the Court's underlying March 28, 2016 Opinion and Order that granted Defendants' motion for summary judgment [ECF No. 265], the accompanying Declaration of Robert D. Lillienstein, dated September 4, 2017, and the pleadings and prior proceedings had herein, Defendants, by their undersigned counsel, will move this Court for an Order, pursuant to 28 U.S.C. § 1927 and the inherent powers of this Court, directing Plaintiff's attorneys Krishnan Chittur and Chittur & Associates, P.C. ("Counsel"), to satisfy personally the excess costs, expenses, and attorneys' fees reasonably incurred by Defendants as a result of Counsel's unreasonable and vexatious multiplication of proceedings in this case.

Also submitted in support of the motion is Defendants' memorandum of law, dated September 3, 2017. Evidence of Defendants' excess costs, expenses, and attorneys' fees will be submitted as directed by the Court.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(b), any answering papers shall be served within fourteen days after service of this motion.

Dated: September 4, 2017
New York, New York

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